

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

STEPHEN H. SOKOLOWSKI and
CHRISTOPHER H. SOKOLOWSKI,

Plaintiffs

- against -

DIGITAL CURRENCY GROUP, INC.,
BARRY E. SILBERT, and SOICHIRO
“MICHAEL” MORO,

Defendants.

Electronically Filed

Civil Action No. 4:25-cv-00001

Hon. Phillip J. Caraballo

Complaint filed January 2,
2025

**UNCONTESTED MOTION OF DEFENDANTS
DIGITAL CURRENCY GROUP, INC. AND BARRY E. SILBERT
TO FILE A BRIEF IN EXCESS OF FIFTEEN PAGES**

Defendants Digital Currency Group, Inc. and Barry E. Silbert, (hereinafter the “Moving Defendants”), by and through their undersigned attorneys, request leave to file a brief in excess of 15 pages and 5,000 words as permitted under Local Rule 7.8, and in support thereof aver as follows:

1. The undersigned represents the Moving Defendants in this action alleging claims under the Pennsylvania Unfair Trade Practices and Consumer Protection Law.
2. On March 4, 2025, the Moving Defendants filed the Motion of Digital Currency Group, Inc. and Barry E. Silbert to Dismiss Plaintiffs’ Complaint (Doc. 9) (the “Motion to Dismiss”).

3. Plaintiffs' Complaint in this action (Doc. 1) is sixty-six (66) pages long and contains 125 paragraphs, not including the five (5) exhibits annexed to the Complaint, which take up an additional thirty-nine (39) pages, for a total of 115 pages. As Plaintiffs themselves acknowledge at the outset of their Complaint "this Complaint is lengthy," but they assert that such length is warranted "given the complexity" of the alleged issues, "the need to plead fraud with particularity," the "importance of establishing a factual basis for piercing the corporate veil," and the need for "a detailed recitation of the facts ... to state a plausible claim for relief," among other considerations. (Compl. at 2.)

4. In addition to its length, Plaintiffs' Complaint presents multiple, independent grounds for dismissal, including lack of standing, failure to state a claim, and lack of personal jurisdiction. Moving Defendants thus request leave to exceed the page and word count limits set forth in Local Rule 7.8 to adequately brief these issues.

5. The Moving Defendants conferred with Plaintiffs by email on March 12, 2025 and Plaintiffs do not object to Moving Defendants' request.

6. Accordingly, the Moving Defendants request permission to file a brief in support of their Motion to Dismiss that does not exceed 30 pages and 7,500 words.

WHEREFORE, the Moving Defendants respectfully request that this Honorable Court grant the within Motion to file a brief in support of their Motion to Dismiss that is in excess of 15 pages and 7,500 words, but that does not exceed 30 pages.

Respectfully submitted,

McCORMICK LAW FIRM

By /s/ Brian J. Bluth
Brian J. Bluth, Esquire
PA I.D. 87432

835 West Fourth Street
Williamsport, PA 17701
(570) 326-5131
(570) 601-0768 (fax)
bbluth@mcclaw.com
– and –
Benjamin S. Kaminetzky (*motion for admission pro hac vice pending*)
Daniel J. Schwartz (*motion for admission pro hac vice pending*)
Matthew R. Brock (*motion for admission pro hac vice pending*)
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
ben.kaminetzky@davispolk.com
daniel.schwartz@davispolk.com
matthew.brock@davispolk.com

Attorneys for Defendants Digital Currency Group, Inc. and Barry E. Silbert

CERTIFICATE OF SERVICE

I hereby certify that the attached ***Motion of Defendants Digital Currency Group, Inc. and Barry E. Silbert to File a Brief in Excess of Fifteen Pages***, was electronically filed with the court and electronically served upon all counsel on March 13, 2025. I further certify that a copy of the foregoing was served on defendant Soichiro “Michael” Moro by United States Mail at the below address on March 13, 2025:

Soichiro Michael Moro
1 Clinton Street, Apartment 32 C
Brooklyn, NY 11201

McCORMICK LAW FIRM

By: /s/ Brian J. Bluth
Brian J. Bluth, Esquire
PA I.D. 87432

835 West Fourth Street
Williamsport, PA 17701
(570) 326-5131
(570) 601-0768 (fax)
bbluth@mcclaw.com